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11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 United States of America,

14 Plaintiff,

15 v.

16 Brandon Robinson,

17 Defendant.

Case No. 2:25-cr-00018-RFB-MDC

Stipulation

18 The parties stipulate and agree that the Court should grant the request for
19 modification (ECF No. 2) and vacate the hearing currently set for February 19, 2025,
20 at 8:30 AM.

21 The Court accepted supervision of Mr. Robinson on January 30, 2025. (ECF
22 No. 3.) Around the same time, United States Probation Officer Steven Goldner filed
23 a Request for Modification to Conditions of Supervision with Consent of Offender.
24 (ECF No. 2.) Officer Goldner requested that Mr. Robinson be ordered to reside at the
25 residential reentry center for up to 90 days. (*Id.*) The Court set a hearing on the
26 request. (ECF Nos. 8, 9.)

27 The parties respectfully submit that a hearing is unnecessary at this time.
Defense counsel has spoken with Mr. Robinson about the modification request and

1 confirmed that he has no objection to residing at the halfway house for up to 90 days
2 while he secures a stable and accessible residence. In addition, Mr. Robinson provided
3 defense counsel with an offer letter showing that he began full-time employment on
4 February 13, 2025, with Czar Marketing Group. In this position, Mr. Robinson works
5 in a call center Mondays through Saturday from 11 AM to 6 PM. With this
6 employment, it appears Mr. Robinson will be able to accrue funds to secure
7 permanent housing while he resides at the residential reentry center.

8 Accordingly, the parties stipulate and agree that the Court should grant the
9 request for modification (ECF No. 2) and vacate the hearing currently set for
10 February 19, 2025, at 8:30 AM.

11 Dated February 14, 2025.

12 RENE L. VALLADARES
13 Federal Public Defender

SUE FAHAMI
Acting United States Attorney

14
15 By /s/ Rick Mula
16 RICK MULA
17 Assistant Federal Public Defender

By /s/ Brenna Bush
BRENNNA BUSH
Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America,

Plaintiff,

v.

Brandon Robinson,

Defendant.

Case No. 2:25-cr-00018-RFB-MDC

[Proposed] Order

IT IS THEREFORE ORDERED that the Request for Modification to Conditions of Supervised Release (ECF No. 2) is granted.

IT IS FURTHER ORDERED that the hearing currently scheduled for February 19, 2025, at 8:30 AM is vacated.

DATED this ¹⁷ day of February, 2025.



UNITED STATES DISTRICT JUDGE